

EXXON COMPANY, U.S.A.

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MARKETING DEPARTMENT
CENTRAL DISTRIBUTION CENTER

#87
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JUL 23 1984

DEPARTMENT OF
ENVIRONMENTAL QUALITY
HAZARDOUS WASTE MANAGEMENT

July 16, 1984

RE: Our Meeting of April 6, 1984

Ms. Joan Albritton
Office of Solid and Hazardous Waste
Louisiana Department of Environmental Quality
P. O. Box 44066
Baton Rouge, Louisiana 70804

Dear Ms. Albritton:

You will recall that we met in your office on April 6, 1984 and discussed Exxon's marketing terminal operations in Louisiana. We inquired about current reporting requirements for registered generators and the possibility of withdrawing registrations for one or more of our facilities. At that time we related to you the fact that from July to October 1980 tank sludge from leaded tank bottoms was landfarmed at Exxon terminals, as had previously been standard industry practice. You indicated to us that if Exxon could show that the tank bottoms landfarmed were not in fact classifiable as having hazardous characteristics, that this would satisfy the DEQ.

The tank bottoms at issue are from marketing terminals and thus are not included as listed hazardous wastes under the Louisiana Hazardous Waste Regulations. If hazardous, they are so classified based upon ignitability or EP Toxicity. Although the leaded tank bottoms were probably ignitable when generated (1980) they would not now be ignitable after four years of weathering. Admixture with soil and volatilization of light components would logically render the waste non-ignitable.

A number of tests have been undertaken on such tank bottoms utilizing the EP Toxicity test for lead. In November 1980 Exxon examined two samples of our leaded tank bottom sludge and neither displayed the EP Toxic characteristic for lead. Further, an API Report was done at the time, a summary of which is attached. Nineteen samples of leaded tank bottoms were tested and only one was EP Toxic. Thus, of the total of 21 leaded tank bottoms analyzed for EP Toxicity, only one has been found greater than the RCRA limit of 5 mg/l. In fact only two of the 21 samples were greater than one mg/l. Over 50 % of the samples were 0.2 mg/l or less. The mean concentration of all samples was 0.87 mg/l with an upper 99% confidence limit of 2.3 mg/l. These data strongly suggest that leaded tank bottoms from marketing terminals are not hazardous based on lead content.

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Ms. Joan Albritton

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Based on the above information, we hope we have satisfied the DEQ as to our past practices. No landfarming of tank bottoms has taken place since 1980 and these wastes are now disposed of at permitted disposal facilities.

As we discussed in our April 6 meeting, the requirements for reporting of registered generators have been changed to only once per year. You also indicated that, though hazardous waste is generated only infrequently, it still makes sense to maintain our marketing terminals' registration status. Based on this, Exxon does not at this time wish to withdraw from registration as a generator.

Please call me at 359-7604 if you have any further questions.

Very truly yours,

A handwritten signature in cursive script that reads "Kurt H. Reinmiller" followed by a date "7/16".

Kurt H. Reinmiller

KHR:kfr

c: Mr. Charles Goldberg

bc: Mr. J. E. Allen, III
Mr. R. W. Dennis
Mr. J. S. Olsen